

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

DEAN OBEIDALLAH, Plaintiff, v. ANDREW B. ANGLIN, DBA <i>Daily Stormer</i> , and MOONBASE HOLDINGS, LLC, DBA Andrew Anglin, and JOHN DOES NUMBERS 1–10, Individuals who also assisted in the publication or representation of false statements regarding Mr. Obeidallah, Defendants.	CASE NO. 2:17-CV-00720-EAS-EPD Chief Judge Edmund A. Sargus Magistrate Judge Elizabeth Preston Deavers
DECLARATION OF TYLER WILLIAMS IN SUPPORT OF PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT	

I, Tyler Williams, am an attorney licensed to practice law in the District of Columbia and am admitted *pro hac vice* in the above-captioned case. I am an attorney with Latham & Watkins LLP and am counsel of record for Plaintiff Dean Obeidallah in the above-captioned matter. My statements are based on personal knowledge, and if called as a witness about the facts contained in these statements, I could testify competently based on such personal knowledge.

I declare as follows:

1. **Sealed Exhibit A** to the Supplement to Plaintiff's Motion for Default Judgment, which has been filed with the contemporaneously filed Motion to Seal, are images of numerous checks deposited into a bank account belonging to Defendant Anglin, produced by a third-party financial institution that Plaintiff has not publicly named (ECF No. 47 at 7, 12).

2. **Sealed Exhibit B** to the Supplement to Plaintiff's Motion for Default Judgment, which has been filed with the contemporaneously filed Motion to Seal, are monthly statements associated with a bank account belonging to Defendant Anglin, produced by a third-party financial institution that Plaintiff has not publicly named (ECF No. 47 at 7, 12).

3. Attached as **Exhibit C** is a true and correct copy of a print-out from twitter.com/neonaziwallets, an automated feed of Bitcoin transactions involving suspected extremists' virtual "wallets", showing \$378,680.44 USD received by Andrew Anglin.

4. Attached as **Exhibit D** is a true and correct copy of the sworn declaration of Dean Obeidallah dated February 20, 2019

5. Attached as **Exhibit E** is a true and correct copy of an article published on the *Daily Stormer* website titled "White House Slams Fake News Hoaxsters as Journalist Squeal Like the Pigs They Are!", dated June 27, 2017, and signed by Andrew Anglin.

6. Attached as **Exhibit F** is a true and correct copy of an article published on the *Daily Stormer* website titled "Andrew Anglin has Retained America's #1 First Amendment Lawyer to Represent Him Against SPLC", dated June 10, 2017, and signed by Andrew Anglin.

7. Attached as **Exhibit G** is a true and correct copy of a print-out from Hatreon.net/Anglin, titled "Andrew Anglin is creating the *Daily Stormer*", and showing recurring donations of \$3,655 per month.

8. Attached as **Exhibit H** is a true and correct copy of an article published on the *Daily Stormer* website titled “SPLC is Suing Anglin! Donate Now to Stop These Kikes”, dated April 27, 2017.

9. Attached as **Exhibit I** is a true and correct copy of an article published on the *Daily Stormer* website titled “ISIS Operative Dean Obeidallah Says Moslems the Real Victims”, dated November 16, 2015, and signed by Andrew Anglin.

10. Attached as **Exhibit J** is a true and correct copy of an article published on the *Daily Stormer* website titled “Steven Crowder Allegedly Hunting Manchester Bombing Mastermind Dean Obeidallah in ISIS-Occupied Syria!”, dated August 29, 2017, and signed by Andrew Anglin.

11. Attached as **Exhibit K** is a true and correct copy of the Complaint filed by Plaintiff Tanya Gersh against Defendant Anglin et al. in *Gersh v. Anglin*, 9:17-cv-00050-DLC-JCL (D. Mont.).

12. Attached as **Exhibit L** is a true and correct copy of the Complaint filed by Plaintiff Taylor Dumpson against Defendant Anglin et al. in *Dumpson v. Ade*, 1:18-cv-01011-RMD (D.D.C.).

13. Attached as **Exhibit M** is a true and correct copy of the First Amended Complaint filed by numerous plaintiffs against Defendant Anglin et al. in *Sines v. Kessler*, 3:17-cv-00072-NKM-JCH (W.D. Va.).

14. Upon information and belief, Defendants Andrew B. Anglin and Moonbase Holdings, LLC are neither minors nor incompetent persons, nor currently serving in the military.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 2/22/2019

/s/ Tyler S. Williams

Tyler S. Williams (D.C. Bar No. 888242297)

LATHAM & WATKINS LLP

555 Eleventh St., NW, Suite 1000

Washington, D.C. 20004-1304

Phone: 202.637.2200

Fx: 202.637.2201

tyler.williams@lw.com

Attorney for Plaintiff Dean Obeidallah